

# **EXHIBIT “F”**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NO. 2:15-cv-01815-SD  
JURY TRIAL DEMANDED

JOSEPH and URSY                    )  
A. VITALE                            )  
  ) DEPOSITION UPON  
  )  
  ) ORAL EXAMINATION  
  )  
  ) OF  
  )  
  ) OF  
  )  
ELECTROLUX HOME                    ) URSY A. VITALE  
PRODUCTS, INC.                     )

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TRANSCRIPT OF ORAL DEPOSITION, taken by  
and before DONNA HUNTER, Registered Professional  
Reporter and Notary Public, at the Offices of deLUCA  
LEVINE, LLC, Three Valley Square, 512 E. Township  
Line Road, Suite 220, Blue Bell, PA, on Wednesday,  
December 23, 2015, commencing at 6:15 p.m.

ERSA Court Reporters  
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Philadelphia, PA 19103  
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**URSY A. VITALE**

<div>2</div> <div>1 APPEARANCES:</div> <div>2</div> <div>3 deLUCA, LEVINE, LLC</div> <div>4 By: PATRICK A. HUGHES, ESQUIRE</div> <div>5 Three Valley Square</div> <div>6 Suite 220</div> <div>7 512 E. Township Line Road</div> <div>8 Blue Bell, PA 19422</div> <div>9 Counsel for Plaintiffs</div> <div>10</div> <div>11 NICOLSON LAW GROUP</div> <div>12 BY: ANDREW CARROLL, ESQUIRE</div> <div>13 Rose Tree Corporate II - Suite 6035</div> <div>14 1400 North Providence Road</div> <div>15 Media, PA 19063</div> <div>16</div> <div>17 Counsel for Defendant,</div> <div>18 Electrolux Home Products, Inc.</div> <div>19</div> <div>20 ALSO PRESENT:</div> <div>21 JOSEPH A. VITALE</div> <div>22</div> <div>23</div> <div>24</div>	<div>4</div> <div>1</div> <div>2 (It was stipulated by and between</div> <div>3 counsel that sealing, and certification be</div> <div>4 waived; and that all objections, except as</div> <div>5 to the form of the question, are reserved</div> <div>6 until the time of trial.)</div> <div>7</div> <div>8 . . . URSY A. VITALE, having been</div> <div>9 duly sworn, was examined and testified as</div> <div>10 follows:</div> <div>11 THE REPORTER: Usual stipulations?</div> <div>12 MR. HUGHES: Except for reading and</div> <div>13 signing.</div> <div>14 BY MR. CARROLL:</div> <div>15 Q. Good evening, Mrs. Vitale. My name is</div> <div>16 Andrew Carroll, and I'm an attorney with Nicolson</div> <div>17 Law Group, and I'm here representing the defendant</div> <div>18 in this case, Electrolux. What we're here for today</div> <div>19 is called a deposition.</div> <div>20 Have you ever been deposed before?</div> <div>21 A. No.</div> <div>22 Q. So, basically, what a deposition is, it's a</div> <div>23 question-and-answer session. I'm going to ask you a</div> <div>24 few questions about your background, the home, and</div>																																			
<div>3</div> <div>1 26</div> <div>2</div> <div>3 INDEX</div> <div>4</div> <div>5 WITNESS:</div> <div>6 URSY A. VITALE</div> <div>7</div> <div>8 By Mr. Carroll.....Page 4</div> <div>9</div> <div>10 By Mr. Hughes.....Page 40</div> <div>11</div> <div>12 EXHIBITS</div> <table><tr><th>NUMBER</th><th>DESCRIPTION</th><th>PAGE</th><th>PAGE</th><th>ATTACHED</th></tr><tr><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Vitale-1</td><td>Photograph of house</td><td>9</td><td>47</td><td></td></tr><tr><td>Vitale-2</td><td>Dryer Operating/</td><td>26</td><td>48</td><td></td></tr><tr><td></td><td>Installation Instructions</td><td></td><td></td><td></td></tr><tr><td>Vitale-3</td><td>Checklist for drying</td><td>27</td><td>49</td><td></td></tr><tr><td>Vitale-4</td><td>Stickers</td><td>29</td><td>50</td><td></td></tr></table> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div>	NUMBER	DESCRIPTION	PAGE	PAGE	ATTACHED						Vitale-1	Photograph of house	9	47		Vitale-2	Dryer Operating/	26	48			Installation Instructions				Vitale-3	Checklist for drying	27	49		Vitale-4	Stickers	29	50		<div>5</div> <div>1 the subject fire, and you're going to provide me</div> <div>2 with the answers to the best of your ability.</div> <div>3 A. Okay.</div> <div>4 Q. So, seated to my right, and your left, is a</div> <div>5 court reporter, and it's her job to take down</div> <div>6 everything we say. She's going to then prepare a</div> <div>7 transcript, which I believe you are going to review,</div> <div>8 and the purpose of that is just so that we can use</div> <div>9 it at trial.</div> <div>10 So in connection with that, there are a few</div> <div>11 ground rules that, hopefully, will make this go as</div> <div>12 smoothly as possible.</div> <div>13 The first one is that if you could please</div> <div>14 use all verbal responses. So, shakes of the head,</div> <div>15 and unh-unhs, and uh-huhs, are not so clear on the</div> <div>16 record. So we would appreciate yeses, noes, and</div> <div>17 other verbal responses.</div> <div>18 A. Okay.</div> <div>19 Q. If I ask you a question, and you provide an</div> <div>20 answer, I'm going to assume that you understood the</div> <div>21 question, and that the answer is truthful, to the</div> <div>22 best of your ability.</div> <div>23 Having said that, if for whatever reason you</div> <div>24 don't understand the question, I am happy to</div>
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<p style="text-align: right;">6</p> <p>1 rephrase it. Just let me know.</p> <p>2 A. Okay.</p> <p>3 Q. We're also going to be asking you some</p> <p>4 questions from a while ago about distances, and</p> <p>5 whatnot. So if you don't know the exact answer, "I</p> <p>6 don't know", or "I don't recall" is perfectly</p> <p>7 acceptable.</p> <p>8 Having said that, if you are able to</p> <p>9 approximate, that's great. We do appreciate that,</p> <p>10 and we would like that. Just make sure that you</p> <p>11 make it clear that you are only estimating and</p> <p>12 you're not providing an exact response.</p> <p>13 A. Okay.</p> <p>14 Q. It's important that we also not speak over</p> <p>15 each other. So while you may anticipate the</p> <p>16 question that's coming, it's important that you</p> <p>17 allow me to get the full question out before</p> <p>18 providing your answer to make sure that the record</p> <p>19 is clear, and to make it easier for her to take down</p> <p>20 what we are saying.</p> <p>21 A. I understand.</p> <p>22 Q. Okay. You had an opportunity to meet with</p> <p>23 Mr. Hughes before this deposition?</p> <p>24 A. I did. This is the first time I've seen him</p>	<p style="text-align: right;">8</p> <p>1 children all living with you at that time?</p> <p>2 A. Correct, yes.</p> <p>3 Q. Was anyone else living with you at that</p> <p>4 time?</p> <p>5 A. Just my husband, the five of us.</p> <p>6 Q. Do you have any pets?</p> <p>7 A. Yes.</p> <p>8 Q. What pets do you have?</p> <p>9 A. We have one cat?</p> <p>10 Q. What kind of cat is that?</p> <p>11 A. No specific breed.</p> <p>12 Q. Does she shed at all?</p> <p>13 A. No.</p> <p>14 Q. And, where does she stay in the house?</p> <p>15 A. She likes to, kind of, hangout. I mean, I</p> <p>16 don't really recall, like, specific areas.</p> <p>17 Q. Does she have a litter box in a specific</p> <p>18 area, or anything like that?</p> <p>19 A. The litter box, I'm trying to remember where</p> <p>20 we had it. We had one in the basement. I don't</p> <p>21 recall if there was another spot.</p> <p>22 Q. Okay. And, could you tell me a little bit</p> <p>23 about your educational background.</p> <p>24 A. I attended Community College of Philadelphia</p>
<p style="text-align: right;">7</p> <p>1 today.</p> <p>2 Q. Okay. You understand how the deposition</p> <p>3 works, and you don't need any more time to go --</p> <p>4 A. No, I understand the process.</p> <p>5 Q. Okay. So, we can just go ahead, and get</p> <p>6 started then.</p> <p>7 Could you please provide your full name, and</p> <p>8 address, for the record.</p> <p>9 A. Ursy, middle initial A, Vitale, 1812 Purdie</p> <p>10 Lane, Maple Glen, PA 19002.</p> <p>11 Q. And, is that Purdie, P-U-R-D-I-E?</p> <p>12 A. Yes.</p> <p>13 Q. And, how long have you lived at that</p> <p>14 address?</p> <p>15 A. We moved in June of 2010, so a little over</p> <p>16 five years.</p> <p>17 Q. And, who do you live with on Purdie Lane?</p> <p>18 A. My husband, Joe, and then we have three</p> <p>19 children.</p> <p>20 Q. And, how old are your three children?</p> <p>21 A. Their current ages are 10, and then we also</p> <p>22 have an eight-year-old and a seven-year-old.</p> <p>23 Q. And, this fire occurred in 2014,</p> <p>24 September 4th, 2014, specifically. Were the three</p>	<p style="text-align: right;">9</p> <p>1 for a little bit.</p> <p>2 Q. And, did you get any degrees from there?</p> <p>3 A. No.</p> <p>4 Q. What do you do for a living?</p> <p>5 A. I'm currently staying at home.</p> <p>6 Q. How long have you been taking care of the</p> <p>7 house?</p> <p>8 A. The last 10 years.</p> <p>9 Q. Does anyone in your house smoke?</p> <p>10 A. No.</p> <p>11 Q. And the 1812 Purdie Lane, do you own that</p> <p>12 home?</p> <p>13 A. Yes.</p> <p>14 Q. How long have you owned it?</p> <p>15 A. We purchased it in June of 2010.</p> <p>16 Q. All right, you did say that.</p> <p>17 And, I'm actually going to show you a</p> <p>18 picture. We will have it marked.</p> <p>19 (Photograph marked Vitale Exhibit</p> <p>20 No. 1 for identification.)</p> <p>21 BY MR. CARROLL:</p> <p>22 Q. Ms. Vitale, looking at what's been marked as</p> <p>23 Vitale-1, is that the home at 1812 Purdie Lane?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">10</p> <p>1 Q. And since purchasing the home, have you had 2 any kind of construction done on the home? 3 A. When we first bought the house, we just did, 4 like, some cosmetic things that we put in some new 5 kitchen cabinets, countertops. 6 Q. Do you remember who did that? 7 A. We had -- my husband put in the cabinets, 8 and then we had -- I'm trying to remember. I think 9 it was Colonial Marble that did the countertops -- 10 yes. 11 Q. Was there any kind of electrical, or other 12 noncosmetic work, done in connection with that? 13 A. No. 14 Q. Did you have any other kind of renovations 15 done? 16 A. No. 17 Q. Have you ever had any issues with the house? 18 A. No. 19 Q. Never had to get anything repaired? 20 A. No. 21 Q. Now, if you could just kindly explain to me 22 the layout of the home, maybe start by walking in 23 through the front door? 24 A. Okay. So when you first walk into the</p>	<p style="text-align: right;">12</p> <p>1 laundry room? 2 A. So, you'd have the one door leading into the 3 laundry room, and then there was another door -- 4 when you went into the laundry room, there was also 5 another door that led into a sun room. And then the 6 sun room had another door that led outside to the 7 backyard. 8 Q. And, were both of these doors made out of 9 the same material? 10 A. The door leading into the laundry room, that 11 was just a wooden door. And then the door leading 12 into the sun room was wood with -- it had some glass 13 panes in it. 14 Q. Okay. And, so, the wooden door -- not the 15 sun room door -- but the other wooden door, was that 16 just a solid door? 17 A. Yes. 18 Q. And the window in the sun room door to the 19 laundry room, was that just the top half, or how 20 much of that was glass? 21 A. Yes, the top half. So, you had your lower 22 part was wood, and then you had the panes on the top 23 half, correct. 24 Q. And, what kind of flooring was in the</p>
<p style="text-align: right;">11</p> <p>1 entry, you have the formal living room to the right 2 where these windows are right here. (Indicating) 3 To the left, you have another, like, a 4 family room. When you first walk into the house, 5 you'll see the stairwell leading to the second 6 floor. 7 If you continue straight on the first floor, 8 you will have the kitchen area, and as you go to the 9 back of the house, to the back end on the right-hand 10 side is the formal dining room. 11 And then when you're in the kitchen, if you 12 go to the left, you'll have the powder room, and 13 then you'll go into the laundry room area. 14 Q. So, does the powder room actually connect to 15 the laundry room? 16 A. No. It's a separate -- you know, you have 17 your dining area, your bathroom, and then there was 18 a door that led into the laundry room. And, then -- 19 Q. A door from the powder room to the laundry 20 room? 21 A. No, no, that was separate doors, a separate 22 door for the powder room, and then a separate door 23 leading into the laundry room. 24 Q. Okay. So how many doors lead into the</p>	<p style="text-align: right;">13</p> <p>1 laundry room? 2 A. We have linoleum down there. 3 Q. And, was that entire floor linoleum? 4 A. I'm trying to recall. There might have been 5 one section -- I'm trying to remember. I don't 6 recall if it was full linoleum, or partial. I don't 7 remember. 8 Q. Okay. And just to be clear, we are talking 9 about at the time of the fire? 10 A. Yes. 11 Q. Okay. And, could you describe the layout of 12 the laundry room itself? 13 A. So when you go into the laundry room, you 14 have the utility tub. Like, if you're going in, you 15 are going to see the utility tub to the right. 16 Then, you're going to see the washing machine, and 17 then the dryer. And, then there was also a closet. 18 Q. Where was the closet in relation to the 19 washer and dryer? 20 A. So the washer and dryer are along the wall 21 here, and then across from it is the closet. 22 Q. And, the washer and dryer, do you remember 23 how far apart they were from each other? 24 A. I don't recall.</p>

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<p style="text-align: right;">14</p> <p>1 Q. And, was the dryer in a corner? Were there 2 two walls bordering it, or was it between something 3 else? 4 A. I mean, there was a wall right there. 5 Q. A wall on the backside? 6 A. Yeah. I mean, you know the wall of the 7 house, you know, they were, like, lined up next to 8 each other. 9 Q. And if you are looking at the dryer, was 10 there a wall to the left, as well? 11 A. Yeah. There was space there. Yeah, there 12 was a wall there. 13 Q. Okay. And, how much space was separating 14 that wall on the left from the dryer? 15 A. I don't recall. 16 Q. Okay. Do you recall if there was more, or 17 less, than five feet? 18 A. You're saying against the wall of the house, 19 the dryer up against the wall of the house? 20 MR. HUGHES: Near the left wall of 21 the house. 22 BY MR. CARROLL: 23 Q. It's my understanding if you are looking at 24 the dryer, the wall immediately behind it was the</p>	<p style="text-align: right;">16</p> <p>1 dryer? 2 A. No. 3 Q. What was stored in the closet? 4 A. Like, laundry detergent. 5 Q. Anything else? 6 A. No. 7 Q. Were there any windows in the laundry room? 8 A. Yes. There was one window. Correct, one 9 window. 10 Q. Where was the window? 11 A. Kind of, like, where the utility -- like, 12 the utility tub, and then a little bit over, kind 13 of, like, near the washing machine, like, along the 14 wall there, a small window. 15 Q. And, was the dryer exhausted anywhere? 16 A. I -- 17 MR. HUGHES: Object to form. 18 BY MR. CARROLL: 19 Q. Do you know if the dryer had any kind of 20 venting on it? 21 A. I would talk to -- when you speak to my 22 husband about that, he can give you more information 23 about that. 24 Q. Okay. So, you don't know anything about the</p>
<p style="text-align: right;">15</p> <p>1 wall of the house? 2 A. Correct. 3 Q. And, then there was also a wall to the left 4 of it? 5 A. Correct. 6 Q. Okay. So the wall to the left of it, do you 7 recall if it was more, or less, than five feet away 8 from the dryer? 9 A. I mean, I don't recall. Maybe my husband 10 would remember. I don't really -- I can't really 11 give you, you know -- no, I don't remember the 12 distance. 13 Q. Okay. And, what about between the dryer, 14 and the wall of the house? 15 A. The back wall, I would say definitely -- I 16 would say a minimum of 12 inches. 17 Q. And, did you keep anything above the dryer? 18 A. No. 19 Q. Was there any shelving at all in that room? 20 A. No. 21 Q. And, how far was the closet from the dryer? 22 A. I probably would ask my husband. Joe might 23 be able to give you a better idea. 24 Q. Well, did you store anything around the</p>	<p style="text-align: right;">17</p> <p>1 venting? 2 A. I handled more, you know, just everyday, 3 using the washer, and the dryer. 4 But as far as the maintenance, I would speak 5 to him about that. 6 Q. Okay. And the dryer, itself, did you 7 purchase it? 8 A. No. 9 Q. How did you come to acquire the dryer? 10 A. When we bought the house, the dryer was 11 already in the house. 12 Q. Okay. And, do you know how old it was at 13 the time? 14 A. No. 15 Q. Was that something that you, like, 16 particularly negotiated for in purchasing the home, 17 or -- 18 A. No. 19 Q. Do you remember discussing the dryer, and 20 washer, at any time during the purchase of the home? 21 A. No discussions. 22 Q. And when you moved into the home, was it 23 completely and fully installed? 24 A. Yes.</p>

**URSY A. VITALE**

<p style="text-align: right;">18</p> <p>1 Q. On the day of the fire, was it in the same</p> <p>2 position it was when you originally purchased the</p> <p>3 home?</p> <p>4 A. Yes.</p> <p>5 Q. And, did you receive any kind of</p> <p>6 documentation in regards to the dryer when you</p> <p>7 purchased the home?</p> <p>8 A. No.</p> <p>9 Q. And, you said that you are the primary user</p> <p>10 of the dryer?</p> <p>11 A. Yes.</p> <p>12 Q. So, how often would you use the dryer?</p> <p>13 A. Probably about once a day, sometimes twice a</p> <p>14 day. But, mostly, I would say, like, once a day,</p> <p>15 usually.</p> <p>16 Q. And, did you have any kind of typical loads</p> <p>17 that you would do?</p> <p>18 A. Just, you know, regular clothing for the</p> <p>19 family. You know, bath towels, you know, something</p> <p>20 like that.</p> <p>21 Q. What about, does anybody in the house have</p> <p>22 some kind of work uniform, or anything, aside from</p> <p>23 the usual cotton clothing?</p> <p>24 A. No.</p>	<p style="text-align: right;">20</p> <p>1 Q. And, did you have any problems with the</p> <p>2 dryer prior to the day of the fire?</p> <p>3 A. No.</p> <p>4 Q. Did you ever find that clothes weren't</p> <p>5 drying quick enough, or --</p> <p>6 MR. HUGHES: Object to form.</p> <p>7 You can answer.</p> <p>8 THE WITNESS: No.</p> <p>9 BY MR. CARROLL:</p> <p>10 Q. Did you ever find that your clothes had any</p> <p>11 kind of holes in them, or otherwise damaged, after</p> <p>12 coming out of the dryer?</p> <p>13 A. Never, no.</p> <p>14 Q. And, did you ever clean the dryer?</p> <p>15 MR. HUGHES: Object to form.</p> <p>16 Can you describe what you mean by</p> <p>17 "clean". Are talking about cleaning the</p> <p>18 lint filter?</p> <p>19 BY MR. CARROLL:</p> <p>20 Q. Any kind of cleaning in, or around, the</p> <p>21 dryer, let's start with that?</p> <p>22 A. Okay. So every time, before I would turn</p> <p>23 the dryer on, I always would clean the filter, you</p> <p>24 know, take the lint screen out, you know, get the</p>
<p style="text-align: right;">19</p> <p>1 Q. What kind of detergent did you use?</p> <p>2 A. I don't really have a specific brand. I</p> <p>3 mean, it varies, whatever is on sale. Yes, nothing,</p> <p>4 like, in particular.</p> <p>5 Q. Do you use dryer sheets?</p> <p>6 A. Sometimes.</p> <p>7 Q. Do you know what kind?</p> <p>8 A. I think Bounce, maybe, or Snuggle. I don't</p> <p>9 usually.</p> <p>10 Q. Do you use any fabric softener?</p> <p>11 A. I do not.</p> <p>12 Q. Do you know if the washer has some kind of a</p> <p>13 set load amount?</p> <p>14 A. Oh, the washing machine? I don't recall. I</p> <p>15 don't remember if it did, or not.</p> <p>16 Q. Did you have any specific way of figuring</p> <p>17 out how much to put into the washer?</p> <p>18 A. I mean, I just know, just from years of</p> <p>19 doing laundry, not to overload it. I mean, you just</p> <p>20 take a medium load of laundry, just kind of use your</p> <p>21 visual judgment on it, but...</p> <p>22 Q. And, did you ever put more than that amount</p> <p>23 into the dryer?</p> <p>24 A. No.</p>	<p style="text-align: right;">21</p> <p>1 lint out, and make sure it was clean.</p> <p>2 And then, you know, occasionally, I would</p> <p>3 take, you know, a paper towel, and clean, like, the</p> <p>4 inside with little of water, and just kind of clean</p> <p>5 around.</p> <p>6 Q. And when you say "the inside", what do you</p> <p>7 mean?</p> <p>8 A. Like, around the edges, you know, just</p> <p>9 the --</p> <p>10 Q. Are you talking about, still, where the lint</p> <p>11 trap goes?</p> <p>12 A. Not in -- okay --</p> <p>13 (Brief interruption.)</p> <p>14 MR. HUGHES: Basically, he's asking</p> <p>15 you to describe where you clean the lint --</p> <p>16 BY MR. CARROLL:</p> <p>17 Q. You said that you would use, like, a wet</p> <p>18 paper towel to clean around.</p> <p>19 A. Yes. I mean, just around, like, the edges</p> <p>20 just to make sure that there was no, like, little</p> <p>21 buildup or -- I don't know -- just anything.</p> <p>22 Usually there wasn't but, you know, just a</p> <p>23 little --</p> <p>24 MR. HUGHES: Are you referring to</p>

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<p style="text-align: right;"><b>22</b></p> <p>1 inside the drum?</p> <p>2 THE WITNESS: Yes, inside the drum.</p> <p>3 I just kind of look around, and --</p> <p>4 BY MR. CARROLL:</p> <p>5 Q. Okay. So, the drum itself?</p> <p>6 A. Yes, just to make sure there's no, like, I</p> <p>7 don't know, little dirt particles. I don't know,</p> <p>8 just -- you know, something like that.</p> <p>9 Q. Okay. And when you said you cleaned the</p> <p>10 lint trap, did you use your hand, or a dryer sheet,</p> <p>11 or --</p> <p>12 A. I always use my hand, and just went through,</p> <p>13 and made sure there was no remnants left over in</p> <p>14 there.</p> <p>15 Q. And, did you do any other kind of cleaning</p> <p>16 inside the dryer?</p> <p>17 MR. HUGHES: Object to form.</p> <p>18 Could you be more specific with</p> <p>19 what you mean by "inside the dryer"?</p> <p>20 Are you talking about disassembling</p> <p>21 the dryer, or are you talking about --</p> <p>22 MR. CARROLL: Anything inside the</p> <p>23 four walls of the dryer in any way.</p> <p>24 MR. HUGHES: I'm still going to</p>	<p style="text-align: right;"><b>24</b></p> <p>1 Q. So either between the dryer, and the washer,</p> <p>2 or between the back wall, and the dryer?</p> <p>3 A. I mean, I would wipe down, you know, the</p> <p>4 top, like if there was ever any dust. You know,</p> <p>5 what I would normally do, if I saw a little bit of</p> <p>6 dust, just wipe it off and, you know...</p> <p>7 MR. HUGHES: And, specifically,</p> <p>8 he's asking you the areas on the floor, like</p> <p>9 around the dryer, did you ever sweep or</p> <p>10 vacuum?</p> <p>11 THE WITNESS: Oh, yeah, definitely.</p> <p>12 We would always sweep and vacuum, and things</p> <p>13 like that, before.</p> <p>14 BY MR. CARROLL:</p> <p>15 Q. Okay. And, how often would you sweep and</p> <p>16 vacuum around?</p> <p>17 A. Daily. I mean, you know, every other day,</p> <p>18 you know, just -- I would say a few times a week,</p> <p>19 definitely, two to three times a week.</p> <p>20 Q. And, this cleaning of the area around the</p> <p>21 dryer, did that ever include pulling the dryer out</p> <p>22 from the wall?</p> <p>23 A. I would talk to my husband about that</p> <p>24 because that's his area of -- I would direct, if you</p>
<p style="text-align: right;"><b>23</b></p> <p>1 object to the form. Anything other than</p> <p>2 what she's already testified to --</p> <p>3 MR. CARROLL: I mean, I don't want</p> <p>4 to get too technical with her, you know.</p> <p>5 MR. HUGHES: But, I mean, I want to</p> <p>6 be fair to the witness, and have -- part of</p> <p>7 the defense in this case -- we can go off</p> <p>8 the record here.</p> <p>9 (Discussion held off the record.)</p> <p>10 BY MR. CARROLL:</p> <p>11 Q. So, Ms. Vitale, you testified that you</p> <p>12 cleaned the lint trap, and you testified that</p> <p>13 cleaned inside the drum.</p> <p>14 Did you otherwise take apart the dryer in</p> <p>15 any way to clean other areas of it?</p> <p>16 A. No.</p> <p>17 Q. Okay. And, what about outside of the dryer,</p> <p>18 did you clean outside of it?</p> <p>19 MR. HUGHES: Are you talking about</p> <p>20 the area around the dryer --</p> <p>21 MR. CARROLL: Yes.</p> <p>22 MR. HUGHES: -- or the dryer</p> <p>23 itself?</p> <p>24 BY MR. CARROLL:</p>	<p style="text-align: right;"><b>25</b></p> <p>1 have questions about that, to him.</p> <p>2 Q. Okay. So when you personally cleaned the</p> <p>3 area around the dryer, what would you do?</p> <p>4 A. I would just have a broom, and a dustpan,</p> <p>5 and just go around, and get any visible dust. I</p> <p>6 have a little Dustbuster that I would go around, you</p> <p>7 know, the area, and pick up any dust.</p> <p>8 Q. And, you personally never moved the dryer</p> <p>9 out from the wall?</p> <p>10 A. No.</p> <p>11 Q. Did you ever personally disconnect any part</p> <p>12 of the dryer?</p> <p>13 A. No.</p> <p>14 Q. Now, I know you testified you never had any</p> <p>15 technical problems with the dryer prior to the day</p> <p>16 of the fire.</p> <p>17 But, did you ever have any kind of a dryer</p> <p>18 technician come to clean the dryer?</p> <p>19 A. No.</p> <p>20 Q. Did you ever have a technician ever come</p> <p>21 work on it in any way?</p> <p>22 A. No.</p> <p>23 Q. Now, I want to show you some documents.</p> <p>24 MR. CARROLL: Let's mark this as</p>



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<p style="text-align: right;">26</p> <p>1 Vitale-2.  2 (Document marked Vitale Exhibit No.  3 2 for identification.)  4 BY MR. CARROLL:  5 Q. I'm showing you what has been marked as  6 Vitale-2. It's labeled Dryer Owner's Manual and  7 Installation Instructions.  8 Could you just take a look at that for a  9 second?  10 A. (Witness complies.)  11 Q. You don't have to read every word. Just  12 familiarize yourself with the document.  13 A. Okay. I was just kind of looking through  14 it. Okay.  15 Q. Does this document look familiar at all to  16 you?  17 A. I have never seen this before.  18 Q. Have you ever seen any kind of Dryer Owner's  19 Manual or Installation Instructions before, either  20 with this dryer, or any other dryer?  21 A. No.  22 Q. Do you recall ever receiving any kind of  23 documentation with the dryer when you purchased the  24 home?</p>	<p style="text-align: right;">28</p> <p>1 A. No.  2 Q. Have you ever seen this particular checklist  3 before?  4 A. I have not.  5 Q. Have you ever seen a checklist like this  6 with any other dryer?  7 A. No.  8 Q. Does any of that information look familiar  9 to you?  10 MR. HUGHES: Look familiar as in  11 has she seen it before?  12 MR. CARROLL: As in has she seen  13 information provided on this before?  14 THE WITNESS: Well, I know always  15 clean your lint filter before every dryer  16 cycle. And, that's something that I always  17 do, so...  18 BY MR. CARROLL:  19 Q. It also references Installation  20 Instructions, and outdoor vent hoods.  21 Do either of those terms, or phrase, -- do  22 you recognize those phrases at all?  23 A. Yes. I mean...  24 MR. HUGHES: He is asking you</p>
<p style="text-align: right;">27</p> <p>1 A. No.  2 Q. Had you owned a dryer prior to this dryer?  3 A. Yes.  4 Q. Do you recall ever receiving any  5 documentation with those dryers?  6 A. I'm sure we did. I don't remember ever  7 looking through it.  8 Q. Okay. I'm going to show you another  9 document here.  10 MR. CARROLL: We'll mark this as  11 Vitale-3, please.  12 (Document marked Vitale Exhibit No.  13 3 for identification.)  14 BY MR. CARROLL:  15 Q. Now, looking at what's been marked as  16 Vitale-3, I will represent to you this is actually  17 an engineering diagram here so that some of the  18 outside stuff, I want you to ignore.  19 But, just look at the part that says "Follow  20 This Check List For Best Drying Performance", and  21 then it lists a few items.  22 A. Okay.  23 Q. So looking at this checklist, do you  24 recognize this at all?</p>	<p style="text-align: right;">29</p> <p>1 generally, do you know what they mean?  2 THE WITNESS: Yes, I understand  3 what they mean, you know, as far as making  4 sure you have proper, you know, ductwork,  5 nothing clogging it, you know.  6 BY MR. CARROLL:  7 Q. Okay. So while you haven't seen this  8 particular checklist, you are familiar with at least  9 those two aspects of the dryer?  10 A. Sure.  11 (Document marked Exhibit Vitale No.  12 4 for identification.)  13 BY MR. CARROLL:  14 Q. What's being marked as Vitale-4, I am going  15 to again tell you to go ahead and ignore what you  16 see on the outside. What's important is what's  17 inside the box.  18 A. Okay, sure.  19 Q. Now, looking at what's within that box, do  20 you recognize ever seeing this before?  21 A. No.  22 Q. Do you recall ever seeing any kind of  23 stickers on the dryer?  24 A. No.</p>

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<p style="text-align: right;">30</p> <p>1 Q. Did you ever look behind the dryer?</p> <p>2 A. No.</p> <p>3 Q. Did you ever look on the side of the dryer</p> <p>4 between the washer -- or the side that's next to the</p> <p>5 washer, I should say?</p> <p>6 A. No.</p> <p>7 Q. But, from what you could see on the dryer,</p> <p>8 there were no stickers of any kind?</p> <p>9 A. No.</p> <p>10 MR. HUGHES: Object to form.</p> <p>11 That's not what she said. That</p> <p>12 mischaracterizes her testimony.</p> <p>13 You asked her if she saw this</p> <p>14 sticker before, and she said no.</p> <p>15 MR. CARROLL: Well, then, I asked</p> <p>16 if she had seen any stickers.</p> <p>17 MR. HUGHES: Okay. Do you recall</p> <p>18 seeing any stickers on the dryer?</p> <p>19 THE WITNESS: No.</p> <p>20 BY MR. CARROLL:</p> <p>21 Q. Mrs. Vitale, I want to talk a little bit</p> <p>22 about the day of the actual fire itself.</p> <p>23 At the time of the fire, were you operating</p> <p>24 the dryer?</p>	<p style="text-align: right;">32</p> <p>1 A. I was in the kitchen, and I thought I</p> <p>2 smelled a smoke smell.</p> <p>3 Q. And, the kitchen is on the same level as the</p> <p>4 laundry room?</p> <p>5 A. Correct, yes.</p> <p>6 Q. So what happened after you smelled smoke?</p> <p>7 A. So, I kind of looked around for a minute.</p> <p>8 And I knew I had clothes in the dryer, so I went</p> <p>9 into the laundry room. And when I opened the door</p> <p>10 to the laundry room, I noticed a haze, like, in the</p> <p>11 room, like a -- you could just tell like something</p> <p>12 wasn't right in there. There was kind of, like, a</p> <p>13 little smokey look to the room.</p> <p>14 Do you want me to continue?</p> <p>15 Q. Yes.</p> <p>16 A. Okay. So, I opened the door to the dryer,</p> <p>17 and I was kind of, like, looking around. And when I</p> <p>18 opened it, I saw, like, a little bit of, like, smoke</p> <p>19 come out. And, I was kind of alarmed when I saw</p> <p>20 that.</p> <p>21 So I went to look around for a fire</p> <p>22 extinguisher, and at that point the smoke detectors</p> <p>23 starting to go off in the house. And my three kids</p> <p>24 were home, and they were getting scared. And when I</p>
<p style="text-align: right;">31</p> <p>1 A. Yes.</p> <p>2 Q. And, could you tell me what you were using</p> <p>3 it for?</p> <p>4 A. Just drying my children's clothes. There</p> <p>5 may have been a bath towel, or two, in there. That</p> <p>6 was pretty much it.</p> <p>7 Q. Do you recall the size of the load?</p> <p>8 A. I don't recall. I don't really remember.</p> <p>9 Q. And before the load that you put in, that</p> <p>10 ultimately was in during the fire, did you use it</p> <p>11 any other time during the day?</p> <p>12 A. No. I think that was the first time I --</p> <p>13 actually, I don't remember. I don't remember.</p> <p>14 Q. So, can you just take me from the point</p> <p>15 where you put the load into the dryer, and tell me</p> <p>16 what happened then?</p> <p>17 A. Okay. So, I put the load into the dryer. I</p> <p>18 was making dinner for my kids. I'm not sure how</p> <p>19 long into it -- I mean, it probably was in there,</p> <p>20 maybe -- I'm not sure how long, actually, the</p> <p>21 clothes were in there. But, I started to smell,</p> <p>22 like, a smoke smell.</p> <p>23 Q. Where were you when you first started</p> <p>24 smelling a smoke smell?</p>	<p style="text-align: right;">33</p> <p>1 started to walk back into the laundry room, the room</p> <p>2 started filling with black smoke. And, I was</p> <p>3 talking to the fire department -- I called them --</p> <p>4 and she said to get out of the house immediately.</p> <p>5 So, we all ran out.</p> <p>6 Q. And when you saw the smoke, was it coming</p> <p>7 from anywhere in particular on, or in, the dryer?</p> <p>8 A. Well, when I went to -- okay, I did leave</p> <p>9 out a part.</p> <p>10 So when I came back, I noticed that flames</p> <p>11 were shooting out of the dryer. When I went</p> <p>12 through -- I forgot to put that part in there --</p> <p>13 when I was moving the clothes around, that's when I</p> <p>14 saw flames coming out of the dryer. So that's when</p> <p>15 I went to go get the fire extinguisher. And then</p> <p>16 when I came back, that's when the room started to</p> <p>17 fill with -- I'm sorry, it's a little traumatic to</p> <p>18 talk about.</p> <p>19 Q. No problem. Take your time.</p> <p>20 So, you saw the flames, and then you left</p> <p>21 the room, and then you came back to the room?</p> <p>22 A. I was looking for -- I went to go get a fire</p> <p>23 extinguisher, and then when I came back, I could see</p> <p>24 black smoke started to come out, and the room --</p>

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<p style="text-align: right;">34</p> <p>1 Q. Okay. I didn't tell you this instruction  2 earlier, but if you need to take a break at any  3 time, please just let me know. We're happy to take  4 a break. Okay?  5 A. Okay.  6 Q. So the first time you saw flames in the  7 dryer, where, specifically, was it coming from?  8 A. I mean, I'm trying to remember because it  9 was so upsetting but it was kind of, like, from the  10 bottom. It looked to me as though the bottom, I saw  11 flames shooting upward.  12 Q. And when you say the bottom, was it within  13 the drum or, you know, sort of underneath the dryer?  14 A. I mean, I don't know. I just saw flames. I  15 don't, you know -- you know, I can't really specify.  16 You know, when you see flames, you get  17 scared. So you think ut-oh, I'd better do  18 something. So, that's when I went to go get the  19 fire extinguisher.  20 Q. And the second time when you came back --  21 A. Well, that's when I heard, kind of, like a  22 weird noise, and then all of a sudden very thick  23 black/gray smoke started pouring out of the dryer,  24 and it started to fill the house very quickly. And,</p>	<p style="text-align: right;">36</p> <p>1 company was already alerted, and we were standing  2 outside waiting for the fire company to come.  3 Q. When the fire department came, did you speak  4 with anyone?  5 A. They just asked me, you know, if everybody  6 was out of the home. I said they were. And, you  7 know, they just went in, and started doing what they  8 do to try to control the fire.  9 Q. Do you remember anyone from the fire  10 department telling you anything about the fire?  11 A. No. I didn't speak with anybody until later  12 on. You know, they said they were able to contain  13 it, you know, a while later. But, they didn't  14 really speak to me while they were taking care of  15 it.  16 Q. Did they ever speak to you about the source  17 of the fire?  18 A. I mean, I told them that, you know, there  19 was a fire in the laundry room. Actually, I  20 think -- I think someone, actually, when they first  21 came, there was a first responder, and he said, "Do  22 you know where the fire started?" And I said, "My  23 dryer caught on fire."  24 So, I did speak to someone who actually --</p>
<p style="text-align: right;">35</p> <p>1 that's -- you know, the kids were screaming, and we  2 ran out of the house.  3 Q. When you say you heard a noise, can you  4 describe what that noise was like?  5 A. Honestly, I don't. I don't even know how to  6 describe it. I don't know what the noise was, or  7 where it came from. I just heard, you know, some  8 type of a noise.  9 Q. Was it like a bang, or a screech?  10 A. I don't remember.  11 Q. Had you ever heard that noise before?  12 A. No.  13 Q. And, you said you're not sure where it came  14 from?  15 A. I mean, it came from the laundry room.  16 Q. Okay.  17 A. You know, right before I heard the noise,  18 and then all of a sudden, you know, I could see more  19 black smoke started pouring out.  20 Q. Could you tell specifically where in the  21 laundry room it was coming from?  22 A. No.  23 Q. And, what happened after you left the house?  24 A. Well, at that point, you know, the fire</p>	<p style="text-align: right;">37</p> <p>1 I'm sorry, I recall speaking to someone who first  2 came out, and I told them that the fire was in the  3 laundry room because they kind of wanted to know  4 what -- like, they were trying to figure out what  5 way they wanted to get into, like, the source of  6 where it was, to give them, like, a better idea.  7 Q. Do you know how long the fire department was  8 at your home?  9 A. Oh, I don't -- I mean, it's a blur. I mean,  10 hours. I don't have a specific, you know -- I mean,  11 I know we didn't leave till almost midnight. We got  12 into a hotel, it was after -- it was like 12:30 at  13 night. I don't know. Hours.  14 Q. Was the fire department still at your home  15 when you left that night?  16 A. I think they waited until someone came to  17 board up the house. And then once they boarded up  18 the house, we all -- we left after they boarded up  19 the house. So, actually, I don't know if anybody  20 was still there. Once the house was secure, we left  21 with the kids.  22 Q. Do you remember what happened to the dryer  23 afterwards?  24 A. I don't know. I mean, it was dark at that</p>

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<p style="text-align: right;">38</p> <p>1 point. I don't know what happened to the dryer.</p> <p>2 Q. Do you recall ever seeing the dryer again</p> <p>3 after that day?</p> <p>4 A. Well, when the adjusters came out from the</p> <p>5 insurance company, we met them at the home, and the</p> <p>6 dryer was outside in our backyard.</p> <p>7 Q. Do you remember when that was?</p> <p>8 A. The fire was on September 4th. They came</p> <p>9 out a couple days later. I don't remember the exact</p> <p>10 date.</p> <p>11 Q. Was the dryer underneath anything? Did it</p> <p>12 have a tarp over it in any way, or was it just</p> <p>13 sitting out in the yard?</p> <p>14 A. I don't remember.</p> <p>15 Q. And, you said that you went to a hotel the</p> <p>16 night of the fire?</p> <p>17 A. Correct.</p> <p>18 Q. How long were you out of your home following</p> <p>19 the fire?</p> <p>20 A. Oh, total, or just --</p> <p>21 Q. Total.</p> <p>22 A. It was over 10 months, or 10, plus months.</p> <p>23 I would have to look at a calendar to give you an</p> <p>24 exact, but it was definitely a good 10 months, I</p>	<p style="text-align: right;">40</p> <p>1 A. Yes.</p> <p>2 Q. Are you satisfied with all the repairs that</p> <p>3 were done?</p> <p>4 A. Yes.</p> <p>5 Q. And, have you submitted all of the claims</p> <p>6 that you intend to submit to your insurance company?</p> <p>7 A. Yes.</p> <p>8 MR. CARROLL: Okay. I think that's</p> <p>9 all I have for her.</p> <p>10 MR. HUGHES: Okay.</p> <p>11 MR. CARROLL: Do you have any</p> <p>12 questions?</p> <p>13 MR. HUGHES: Yes, I do.</p> <p>14 BY MR. HUGHES:</p> <p>15 Q. Mrs. Vitale, I just have a few questions for</p> <p>16 you.</p> <p>17 First and foremost, were you aware that this</p> <p>18 type of dryer allows lint to collect in areas that</p> <p>19 are not visible to the user, and near the heat</p> <p>20 source, which present a fire hazards?</p> <p>21 MR. CARROLL: Objection.</p> <p>22 BY MR. HUGHES:</p> <p>23 Q. Are you aware of that?</p> <p>24 A. No, I was not.</p>
<p style="text-align: right;">39</p> <p>1 would say.</p> <p>2 Q. And, could you describe for me what kind of</p> <p>3 damage was done to the home?</p> <p>4 A. I mean, my husband could probably get more</p> <p>5 into detail with you. I mean, there was extensive</p> <p>6 smoke damage, obviously. You know, everything had</p> <p>7 to get pretty much -- almost everything had to get</p> <p>8 redone. But, he could get into more detail,</p> <p>9 probably, with you because he was working, I think,</p> <p>10 closely with our contractor.</p> <p>11 Q. Well, was there structural damage to the</p> <p>12 home, do you know?</p> <p>13 A. You probably will have to talk to him more</p> <p>14 about that.</p> <p>15 Q. Okay. But, you said that there was damage</p> <p>16 to the contents?</p> <p>17 A. Oh, definitely, yes.</p> <p>18 Q. Was there anything that was not</p> <p>19 smoke-damaged from the fire?</p> <p>20 A. Some clothes were laundered. You know we</p> <p>21 got back clothes, but that was pretty much it. I</p> <p>22 mean, everything else was damaged.</p> <p>23 Q. And, has your home since been fully</p> <p>24 repaired?</p>	<p style="text-align: right;">41</p> <p>1 Q. You testified earlier that the subject dryer</p> <p>2 came with the purchase of the house. Correct?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. And, that you were not provided with</p> <p>5 a copy of the Owner's Manual, that's marked as</p> <p>6 Vitale-2, when you acquired the dryer. Correct?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. Were you aware that the manufacturer</p> <p>9 recommends that the dryer should be completely</p> <p>10 disassembled, and lint cleaned out of the dryer by a</p> <p>11 qualified technician?</p> <p>12 A. No, I was not aware.</p> <p>13 Q. Okay. If there was a sticker, or some type</p> <p>14 of warning on the dryer in a conspicuous place that</p> <p>15 told you that if you didn't have a qualified</p> <p>16 technician, or if you didn't have the dryer</p> <p>17 completely disassembled, and cleaned out, that lint</p> <p>18 could accumulate near the dryer's heat source, and</p> <p>19 cause a fire, would you follow that instruction?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. You said you cleaned the lint filter</p> <p>22 out before and after every time you used it. Is</p> <p>23 that correct?</p> <p>24 A. Correct.</p>

**URSY A. VITALE**

<p style="text-align: right;">42</p> <p>1 Q. Was the lint filter always in the dryer?</p> <p>2 A. Yes, always.</p> <p>3 Q. Okay. You never operated the dryer without</p> <p>4 the lint filter; is that correct?</p> <p>5 A. Never.</p> <p>6 MR. HUGHES: Okay. Those are all</p> <p>7 the questions I have for you.</p> <p>8 THE WITNESS: Okay.</p> <p>9 MR. CARROLL: No followup.</p> <p>10</p> <p>11 (Witness excused.)</p> <p>12 (Deposition concluded at 6:56</p> <p>13 p.m.)</p> <p>14 - - -</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">44</p> <p>1 E R R A T A</p> <p>2</p> <p>3 PAGE LINE CORRECTION</p> <p>4</p> <p>5 ----</p> <p>6 ----</p> <p>7 ----</p> <p>8 ----</p> <p>9 ----</p> <p>10 ----</p> <p>11 ----</p> <p>12 ----</p> <p>13 ----</p> <p>14 ----</p> <p>15 ----</p> <p>16 ----</p> <p>17 ----</p> <p>18 ----</p> <p>19 ----</p> <p>20 ----</p> <p>21 ----</p> <p>22 ----</p> <p>23 ----</p> <p>24 ----</p>
<p style="text-align: right;">43</p> <p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over carefully</p> <p>4 and make any necessary corrections. You should</p> <p>5 state the reason in the appropriate space on the</p> <p>6 errata sheet for any corrections that are made.</p> <p>7 After do so, please sign the errata sheet</p> <p>8 and date it.</p> <p>9 You are signing same subject to the changes</p> <p>10 you have noted on the errata sheet, which will be</p> <p>11 attached to your deposition.</p> <p>12 It is imperative that you return the</p> <p>13 original errata sheet to deposing attorney within</p> <p>14 thirty (30) days of receipt of the deposition</p> <p>15 transcript by you. If you fail to do so, the</p> <p>16 deposition transcript may be deemed to be accurate</p> <p>17 and may be used in court.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">45</p> <p>1 ACKNOWLEDGEMENT OF DEPONENT</p> <p>2</p> <p>3 I _____, do hereby</p> <p>4 certify that I have read the foregoing pages</p> <p>5 ____ to ____ and that the same is a correct</p> <p>6 transcription of the answers given by me to the</p> <p>7 questions therein set forth, except for the</p> <p>8 corrections or changes in form or substance, if any,</p> <p>9 noted in the attached Errata sheet.</p> <p>10</p> <p>11 - - - - -</p> <p>12</p> <p>13 Subscribed and sworn to before me this</p> <p>14 _____ day of _____, ____.</p> <p>15</p> <p>16 My commission expires:</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 Notary Public</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

**URSY A. VITALE**

<p style="text-align: right;">46</p> <p>1 CERTIFICATE</p> <p>2</p> <p>3 I HEREBY CERTIFY that the proceedings,</p> <p>4 evidence and objections are contained fully and</p> <p>5 accurately in the stenographic notes taken by me</p> <p>6 upon the Deposition of URSY A. VITALE, December 23,</p> <p>7 2016, and that this is a true and correct transcript</p> <p>8 of same.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14 _____</p> <p>15 DONNA HUNTER</p> <p>16 Registered Professional Reporter</p> <p>17 and Notary Public</p> <p>18</p> <p>19 (The foregoing certification of</p> <p>20 this transcript does not apply to any</p> <p>21 reproduction of the same by any means,</p> <p>22 unless under the direct control and/or</p> <p>23 supervision of the certifying reporter.)</p> <p>24</p>	<p style="text-align: right;">48</p> <p>1 Exhibit Vitale-2</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">47</p> <p>1 Exhibit Vitale-1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">49</p> <p>1 Exhibit Vitale-3</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

**URSY A. VITALE**

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URSY A. VITALE

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